

EXHIBIT 1

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

This document relates to:

THE STATE OF TEXAS, *et al.*,

Plaintiffs,

- against -

GOOGLE LLC,

Defendant.

CIVIL NO. 4:20-CV-957-SDJ

PLAINTIFF STATES' AMENDED INITIAL DISCLOSURES

The States of Texas, Alaska, Arkansas, Florida, Idaho, Indiana, Louisiana, Mississippi, Missouri, Montana, Nevada, North Dakota, South Carolina, South Dakota, and Utah, and the Commonwealths of Kentucky and Puerto Rico (collectively referred to hereafter as “Plaintiff States” or “States”), hereby make the following amended initial disclosures under Federal Rule of Civil Procedure 26(a)(1) and Scheduling Order (Doc. 123 in 4:20-CV-957-SDJ). These disclosures are based on information currently available to the Plaintiff States and represent their good-faith efforts to identify: (1) persons likely to have discoverable information that may be used to support the Plaintiff States’ claims in this action, and (2) documents and electronically stored information that may be used to support the Plaintiff States’ claims in this action.

The Plaintiff States reserve the right to supplement and correct these disclosures as discovery proceeds under Federal Rule of Civil Procedure 26(e) and Scheduling Order. These disclosures are not intended to waive any objections that the Plaintiff States may have regarding the use or admissibility of any disclosed information, whether during discovery or trial, and these disclosures do not constitute a waiver of attorney–client privilege, attorney work product protection, or any other applicable privilege or protection.

Pursuant to Rule 26(a)(1)(A)(i), Appendix A identifies those entities and related individuals known to the Plaintiff States at this time who likely have discoverable information that the Plaintiff States may use to support their claims.

Pursuant to Rule 26(a)(1)(A)(ii) and without waiving any objections to relevance, privilege, or admissibility of these materials or agreeing that they are required to be disclosed, the Plaintiff States possess the following materials that they may use to support their claims: documents and data submitted to the Plaintiff States by Google and third parties, including responses to Civil Investigative Demands. These materials are located or available at the offices of the respective Plaintiff States. The Plaintiff States may also use: (i) publicly available documents or data, and (ii) documents and information produced by Google and third parties in this litigation to support their claims or defenses.

Pursuant to Rule 26(a)(1)(A)(iii), the Plaintiff States state that it is premature for the States to provide a complete computation of damages at this time, as the States' computation of damages is highly dependent on information to be obtained from discovery during the course of this action and is not available at this time. The Plaintiff States have, however, provided a preliminary computation of damages and generally described the basis for calculating civil penalties, damages, disgorgement, and restitution sought, in Plaintiff States' Fourth Amended Responses to Google LLC's First Set of Interrogatories (the "Fourth Am. R&Os"). The Plaintiff States will provide expert disclosure(s) and written report(s) related to the computation of damages as required by Rule 26(a)(2) in accordance with the Court's Scheduling Order.

The Plaintiff States do not have insurance agreements relevant to this matter and therefore have no disclosures under Rule 26(a)(1)(A)(iv).

The Plaintiff States additionally provide the following information:

1. **The correct names of the parties to the action.**

The Plaintiff States include the States of Texas, Alaska, Arkansas, Florida, Idaho, Indiana, Louisiana, Mississippi, Missouri, Montana, Nevada, North Dakota, South Carolina, South Dakota, and Utah, and the Commonwealths of Kentucky and Puerto Rico.

The only Defendant is Google LLC.

2. The name and, if known, address and telephone number of any potential parties to the action.

The Plaintiff States do not anticipate any potential additional parties, although other government enforcement agencies may seek to join or intervene in this matter.

3. The name, and if known, the address and telephone number of persons having knowledge of facts relevant to the claim or defense of any party, a brief characterization of their connection to the case, and a fair summary of the substance of the information known by such person.

See Appendix A.

4. A copy of all documents, ESI, witness statements, and tangible things in the possession, custody, or control of the disclosing party that are relevant to the claim or defense of any party.

Beginning on April 22, 2021, the Plaintiff States sent Defendant or caused to be sent to Defendant a copy of all documents, ESI, witness statements,¹ and tangible things in their possession, custody, or control that are relevant to their claims. These productions included all non-privileged communications with third-parties, other than Google, concerning this action and investigation, and all documents (if any) disclosed by Plaintiff States or the third party during each such communication.

¹ Defendant is in possession of all investigational hearing sworn statements that the Plaintiff States took in conjunction with the U.S. Department of Justice during the investigation.

Dated: February 27, 2024

Respectfully submitted,

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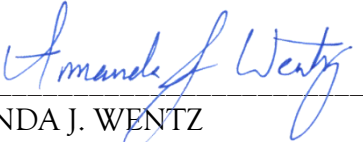
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APPENDIX A**A. Individuals who likely have discoverable information that the Plaintiffs may use to support their claims or defenses.**

Below is a list of individuals and entities who the Plaintiff States, at this time, believe are likely to have discoverable information that the Plaintiff States may use to support their claims or defenses.

Other individuals and entities not named below—including other Google customers, competitors, and employees—may also have discoverable information, and the Plaintiff States reserve the right to supplement this list as discovery proceeds.

1.	Name:	Employees of [REDACTED], <i>including</i> [REDACTED] (Founder)
	Counsel/Contact:	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad server market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

2.	Name:	Employees of [REDACTED], <i>including</i> [REDACTED] (Head of Product, [REDACTED])
	Address:	[REDACTED] [REDACTED]
	Counsel/Contact:	c/o [REDACTED]
	Telephone Number:	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad buying tool market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

3.	Name:	Employees of [REDACTED], <i>including</i> [REDACTED] (Chief Operating Officer, [REDACTED])
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	[REDACTED], Executive Vice President, General Counsel and Secretary

	Telephone Number:	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad exchange market, the ad network market, and the ad server market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct, and the anticompetitive effects arising from that conduct

4.	Name:	Employees of [REDACTED] <i>including</i> [REDACTED] (Associate General Counsel)
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	c/o [REDACTED]
	Telephone Number:	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad server market, the ad exchange market, and the ad buying tools market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

5.	Name:	Employees of [REDACTED], <i>including</i> [REDACTED] (Director of Digital Commerce & Media) and [REDACTED] (Vice President, Credit Digital Marketing)
	Address:	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	[REDACTED], Vice President and Chief Antitrust Counsel
	Telephone Number:	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad buying tools market, ad exchange market, and the instream online video advertising market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

6.	Name:	Employees of [REDACTED]
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	[REDACTED], Global General Counsel
	Telephone Number:	[REDACTED]

	Subject(s):	Relevant product markets at issue in the Complaint, including the ad server market
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7.	Name:	Employees of [REDACTED] and its subsidiaries, <i>including</i> [REDACTED] (Chief Financial Officer at [REDACTED]), [REDACTED] (Senior Vice President and Head of Legal at [REDACTED]), [REDACTED] (Technical Director), [REDACTED], [REDACTED], [REDACTED] (Assistant VP & Sr. Legal Counsel of [REDACTED]), and [REDACTED] (Senior Vice President of Digital Media at [REDACTED].)
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	[REDACTED], Assistant Vice President and Senior Legal Counsel
	Telephone Number:	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad server market, the ad exchange market, and the ad buying tools market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

8.	Name:	Employees of [REDACTED], <i>including</i> [REDACTED] (Director of K-12 Product Strategy)
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	[REDACTED], Compliance Counsel
	Telephone Number:	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad exchange market, the ad network market, and the ad server market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

9.	Name:	Employees of [REDACTED], <i>including</i> [REDACTED] (Owner)
	Address:	[REDACTED] [REDACTED]
	Counsel/Contact:	[REDACTED]

	Telephone Number:	██████████
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad buying tools market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

10.	Name:	██████████ (former Chief Executive Officer of ██████████)
	Counsel/Contact:	██████████
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad server market, the ad exchange market, and the ad buying tools market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

11.	Name:	Employees of ██████████, including ██████████ (Chief Executive Officer)
	Address:	██████████ ██████████ ██████████
	Counsel/Contact:	██████████
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad buying tools market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

12.	Name:	Employees of ██████████ including ██████████ (former Chief Executive Officer of ██████████)
	Address:	██████████ ██████████ ██████████
	Counsel/Contact:	c/o ██████████, Chief Compliance Officer at ██████████
	Telephone Number:	██████████
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13.	Name:	Employees of [REDACTED] and its subsidiary, [REDACTED] including [REDACTED], (Senior Vice President of Media); and [REDACTED] (Executive Director of Media and Advanced Advertising), [REDACTED] (Executive Director, Strategic Partnerships & BD, [REDACTED] (General Manager, [REDACTED])
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	c/o [REDACTED]
	Telephone Number:	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad buying tools market, the ad exchange market, the ad server market, and the instream online video advertising market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

14.	Name:	Employees of [REDACTED], including [REDACTED] (Executive Vice President, Global Supply); [REDACTED] (Chief Technology Officer)
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	Counsel/Contact:	[REDACTED], Executive Vice President and General Counsel
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15.	Name:	Employees of [REDACTED], including [REDACTED] (Director of Global Operations) and [REDACTED] (Chief Operating Officer)
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	Counsel/Contact:	c/o [REDACTED]

	Telephone Number:	(██████████)
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	Telephone Number:	██████████
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17.	Name:	Employees of ██████████ <i>including</i> ██████████ (Publisher and Owner)
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	Counsel/Contact:	██████████
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18.	Name:	Employees of ██████████, <i>including</i> ██████████, (Chief Executive Officer of ██████████, a part of the ██████████), and ██████████ (Executive Officer & Group General Counsel)
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	Counsel/Contact:	██████████, Group General Counsel (located in the UK)

	Telephone Number:	██████████
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19.	Name:	Employees of ██████████, <i>including</i> ██████████ (Chief Executive Officer)
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	Telephone Number:	██████████
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20.	Name:	Employees of ██████████, <i>including</i> ██████████ (Senior Vice President, Ad Sales Revenue and Planning)
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	Counsel/Contact:	c/o ██████████
	Telephone Number:	██████████
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21.	Name:	Employees of ██████████ <i>including</i> ██████████, (Executive Vice President, Finance) and ██████████ (VP of Finance for ██████████ Streaming Services)
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	Telephone Number:	(██████████)
	Subject(s):	Relevant product markets at issue in the Complaint; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

24.	Name:	Employees of [REDACTED], <i>including</i> [REDACTED] (Chief Executive Officer), [REDACTED] [REDACTED] (Chief Operating Officer), [REDACTED] (Vice President, International Sales Operations of [REDACTED] [REDACTED] (Director of Product Management), [REDACTED] (Vice President of Partnerships), [REDACTED] (Business Lead [Chief of Staff], Vice President of Global Marketing Partnerships), [REDACTED] (Vice President of Partnerships Product Marketing, Operations, Partner Engineering, and Analytics), [REDACTED] (Vice President of Business Platform Partnerships), [REDACTED] (Associate General Counsel, Litigation), [REDACTED] (Lead Counsel, Competition)
	Address:	[REDACTED] [REDACTED]
	Counsel/Contact:	c/o [REDACTED]
	Telephone Number:	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad buying tools market, the ad exchange market, the ad network market, the ad server market, and the instream online video advertising market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

25.	Name:	Employees of [REDACTED], <i>including</i> [REDACTED] (Executive Vice President of Digital Products and Technology and Head of Digital Ad Technology)
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	c/o [REDACTED]
	Telephone Number:	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad buying tools market, the ad exchange market, the ad server market, and the instream online video advertising market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

26.	Name:	<p>Employees of [REDACTED], including [REDACTED] (Head of Product Marketing), [REDACTED] (Sr. Director of Product Management, Counter-Abuse Technology), [REDACTED] (Vice President, Product Management), [REDACTED] (Managing Director, Publisher Platforms Strategy), [REDACTED] (Vice President of Engineering), [REDACTED] (Product Manager, User Trust and Privacy), [REDACTED] (Product Lead), [REDACTED] (Co-founder and Board Member, [REDACTED] [REDACTED] (Director, Global Display & Programmatic Specialists), [REDACTED] (Vice President/General Manager, Ads), [REDACTED] (Director, Product Management), [REDACTED] (Product Manager), [REDACTED] (Senior Product Manager), [REDACTED] (Engineering Director), [REDACTED] (Vice President/ General Manager, Display, Video and App Advertising), [REDACTED] (Product Manager), [REDACTED] (Director of Engineering), [REDACTED] (Director, Corporate Strategy), [REDACTED] (Vice President Product Management), [REDACTED] (Senior Product Manager for Sellside Ads Platforms), [REDACTED] (Senior Staff Software Engineer), [REDACTED] (Group Product Manager), [REDACTED] (Senior Product Manager, Identity and Inventory Attachment), [REDACTED] (Chief Product Officer, [REDACTED] (Chief Business Officer, [REDACTED] (Vice President, [REDACTED] & Video Global Solutions), [REDACTED] (Chief Executive Officer), [REDACTED] (Senior Vice President), [REDACTED] (Director of Engineering), [REDACTED] (Principal, Global Strategy), [REDACTED] (Director, Global Marketing Partners), [REDACTED] (Senior Vice President and Chief Business Officer), [REDACTED] (Senior Director, Product Management, [REDACTED] (Group Product Manager), [REDACTED] (Product Manager), [REDACTED] (Managing Director, Global Ads), [REDACTED] (Principal Engineer), [REDACTED] (Product Manager), [REDACTED] (Chief Executive Officer, [REDACTED] (Senior Director of Engineering), [REDACTED] (Vice President, Product Management [Special Projects]), [REDACTED] (Senior Director of Engineering and Distinguished Data Scientist)</p>
	Address:	[REDACTED]
	Counsel/Contact:	[REDACTED]
	Telephone Number:	[REDACTED]

	Subject(s):	Relevant product markets at issue in the Complaint, including the ad buying tools market, the ad exchange market, the ad network market, the ad server market, and the instream online video advertising market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct
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27.	Name:	Former Employee of [REDACTED], including [REDACTED] (formerly, Senior Vice President and Chief Business Officer), [REDACTED] (formerly, Director, Product Management – Publisher Ad Platforms), [REDACTED] (formerly, Group Product Manager, [REDACTED] [REDACTED] [REDACTED] [REDACTED]) (formerly, Vice President, Engineering Display and Video Ads), [REDACTED] (formerly, Senior Vice President of Ads and Commerce), [REDACTED] (formerly, Chief Executive Officer, Chairman, and Technical Advisor)
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad buying tools market, the ad exchange market, the ad network market, the ad server market, and the instream online video advertising market; competition and barriers to entry in the relevant markets; Google’s exclusionary conduct; and the anticompetitive effects arising from that conduct

28.	Name:	Employees of [REDACTED]
	Address:	[REDACTED] [REDACTED]
	Counsel/Contact:	[REDACTED], Counsel
	Telephone Number:	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint

29.	Name:	Employees of [REDACTED]
	Address:	[REDACTED] [REDACTED] [REDACTED] [REDACTED]

	Counsel/Contact:	██████████, Associate General Counsel
	Telephone Number:	██████████
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad exchange market and the ad server market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

30.	Name:	Employees of ██████████, <i>including</i> ██████████ (Chief Digital and Innovation Officer)
	Address:	██████████ ██████████
	Counsel/Contact:	██████████ Associate General Counsel
	Telephone Number:	██████████
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad buying tools market, the ad exchange market, the ad network market, the ad server market, and the instream online video advertising market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

31.	Name:	Employees of ██████████ <i>including</i> ██████████ (Founder)
	Counsel/Contact:	██████████
	Telephone Number:	██████████
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad network market and the ad server market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

32.	Name:	Employees of ██████████, <i>including</i> ██████████ (Senior Vice President, Customer Engagement, Analytics and Insights)
	Address:	██████████ ██████████
	Counsel/Contact:	██████████, Deputy General Counsel
	Telephone Number:	██████████

	Subject(s):	Relevant product markets at issue in the Complaint, including the ad buying tools market and the instream online video advertising market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct
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33.	Name:	Employees of [REDACTED], <i>including</i> [REDACTED] (President)
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	[REDACTED]
	Telephone Number:	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad buying tools market, the ad exchange market, the ad network market, and the instream online video advertising market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

34.	Name:	Employees of [REDACTED], <i>including</i> [REDACTED] (President)
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	c/o [REDACTED]
	Telephone Number:	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad exchange market, the ad network market, and the ad server market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

35.	Name:	Employees of [REDACTED] f/k/a [REDACTED], <i>including</i> [REDACTED] (Chief Technology Officer)
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	c/o [REDACTED]
	Telephone Number:	([REDACTED])

	Subject(s):	Relevant product markets at issue in the Complaint, including the ad buying tools market, the ad exchange market, the ad network market, the ad server market, and the instream online video advertising market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct
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36.	Name:	Employees of [REDACTED], <i>including</i> [REDACTED] (Global Head of Business Development)
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	c/o [REDACTED]
	Telephone Number:	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad buying tools market, the ad exchange market, the ad network market, and the instream online video advertising market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

37.	Name:	Employees of [REDACTED] <i>including</i> [REDACTED] (Senior Director, Global Audience Ads), [REDACTED] (Deputy General Counsel), [REDACTED] (Deputy General Counsel), [REDACTED]
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	c/o [REDACTED]
	Telephone Number:	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad buying tools market, the ad exchange market, the ad network market, and the ad server market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

38.	Name:	Employees of [REDACTED]
	Address:	[REDACTED] [REDACTED]
	Counsel/Contact:	c/o [REDACTED]
	Telephone Number:	[REDACTED]

	Subject(s):	Relevant product markets at issue in the Complaint
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39.	Name:	Employees of [REDACTED], <i>including</i> [REDACTED] (Director, Marketing Communications / Head of Media Center of Excellence), [REDACTED] (Managing Counsel, Acquisitions, Business Development & Commercial Transactions, [REDACTED]))
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	[REDACTED], Managing Counsel
	Telephone Number:	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad buying tools market and the instream online video advertising market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

40.	Name:	Employees of [REDACTED], <i>including</i> [REDACTED] (Senior Vice President, Ad Innovation) and [REDACTED] (Senior Director, Ad Platforms)
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	c/o [REDACTED]
	Telephone Number:	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad exchange market, the ad network market, and the ad server market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

41.	Name:	Employees and Representatives of [REDACTED], <i>including</i> [REDACTED] (Vice President of Advertising at [REDACTED]) [REDACTED] (Senior Vice President Global Competition Law and Policy at [REDACTED] and [REDACTED]) [REDACTED] (Consultant)
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	c/o [REDACTED]
	Telephone Number:	[REDACTED]

	Subject(s):	Relevant product markets at issue in the Complaint, including the ad exchange market, the ad network market, and the ad server market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct
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42.	Name:	Employees of [REDACTED], including [REDACTED] (Senior Vice President and General Counsel)
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	c/o [REDACTED]
	Telephone Number:	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad exchange market, the ad network market, and the ad server market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

43.	Name:	Employees of [REDACTED] (Chief Executive)
	Address:	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	[REDACTED]
	Telephone Number:	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad exchange market, the ad network market, and the ad server market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

44.	Name:	Employees of [REDACTED], including [REDACTED] (Director of Digital Marketing)
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	[REDACTED], Senior Counsel
	Telephone Number:	[REDACTED]

	Subject(s):	Relevant product markets at issue in the Complaint, including the ad buying tools market and the instream online video advertising market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct
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45.	Name:	Employees of [REDACTED], including [REDACTED] (COO), [REDACTED] (President, CMO for North America)
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	c/o [REDACTED]
	Telephone Number:	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad buying tools market and the instream online video advertising market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

46.	Name:	Employees of [REDACTED], including [REDACTED] (President and Chief Executive Officer)
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	c/o [REDACTED]
	Telephone Number:	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad buying tools market, the ad exchange market, and the ad server market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

47.	Name:	Employees and Representatives of [REDACTED] including [REDACTED] (Executive Vice President), [REDACTED] (Vice President), [REDACTED] (Director, State Government Affairs), [REDACTED] (Senior Policy Advisor)
	Address:	[REDACTED] [REDACTED]
	Counsel/Contact:	[REDACTED], Senior Managing Counsel

	Telephone Number:	██████████
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad buying tools market and the instream online video advertising market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

48.	Name:	Employees of ██████████, <i>including</i> ██████████ (Chief Product Officer and Head of Technology)
	Address:	██ ██ ██████████
	Counsel/Contact:	██████████, Executive Vice President and General Counsel
	Telephone Number:	██████████
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad buying tools market, the ad exchange market, and the ad server market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

49.	Name:	Employees of ██████████, <i>including</i> ██████████ (Vice President of Revenue Operations) and ██████████ (Vice President, Search Engine Optimization), ██████████ (Sr. VP/Deputy General Counsel)
	Address:	██ ██ ██████████
	Counsel/Contact:	██████████, Senior Vice President/ Deputy General Counsel
	Telephone Number	██████████
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad exchange market, the ad network market, and the ad server market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

50.	Name:	Employees of [REDACTED], <i>including</i> [REDACTED] (Vice President of Global Media), [REDACTED] (Media Operations and Innovation), and [REDACTED] (North American Brand Media)
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	[REDACTED], Attorney
	Telephone Number	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad buying tools market and the instream online video advertising market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

51.	Name:	Employees of [REDACTED], <i>including</i> [REDACTED] (Chief Strategy Officer)
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	[REDACTED], Deputy General Counsel
	Telephone Number:	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad buying tools market, the ad exchange market, the ad network market, and the instream online video advertising market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

52.	Name:	Employees of [REDACTED], <i>including</i> [REDACTED] (General Counsel)
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	c/o [REDACTED]
	Telephone Number:	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad buying tools market, the ad exchange market, the ad server market, and the instream online video advertising market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

53.	Name:	Employees of [REDACTED], <i>including</i> [REDACTED] (Senior Vice President, Marketing and Merchandising)
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	[REDACTED], Executive Vice President, General Counsel
	Telephone Number:	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad buying tools market and the instream online video advertising market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

54.	Name:	Employees of [REDACTED], <i>including</i> [REDACTED] (Chief Strategy Officer)
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	[REDACTED]
	Telephone Number:	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad exchange market and the ad server market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

55.	Name:	Employees of [REDACTED], <i>including</i> [REDACTED] (Chief Product Officer) and [REDACTED] (President)
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	c/o [REDACTED]
	Telephone Number:	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad exchange market, the ad server market, and the instream online video advertising market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

56.	Name:	Employees of [REDACTED], <i>including</i> [REDACTED] (Vice President of Marketing), [REDACTED] (Enterprise Tech Executive), [REDACTED] (Digital Assets and Strategy), [REDACTED], and [REDACTED]
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	[REDACTED], Associate General Counsel
	Telephone Number	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad buying tools market and the instream online video advertising market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

57.	Name:	Employees of [REDACTED], <i>including</i> [REDACTED] (Chief Product Officer), and [REDACTED] (Sr. VP/Head of Government Relations)
	Address:	[REDACTED] [REDACTED]
	Counsel/Contact:	[REDACTED] Senior Vice President/ Head of Government Relations
	Telephone Number:	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad exchange market, the ad network market, the ad server market, and the instream online video advertising market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

58.	Name:	Employees of [REDACTED], <i>including</i> [REDACTED] (General Counsel and Company Secretary), [REDACTED] (Director of Public Policy), [REDACTED] (Head of Programmatic), [REDACTED] (Global Head of Programmatic Solutions), and [REDACTED] (Director of Audience Data Strategy)
	Address:	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	[REDACTED], General Counsel and Company Secretary
	Telephone Number	[REDACTED]

	Subject(s):	Relevant product markets at issue in the Complaint, including the ad exchange market and the ad server market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct
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59.	Name:	Employees of [REDACTED], including [REDACTED] (Chief Revenue Officer)
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	c/o [REDACTED]
	Telephone Number	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad buying tools market, the ad exchange market, the ad network market, and the instream online video advertising market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

60.	Name:	Employees of [REDACTED], including [REDACTED] (General Counsel) and [REDACTED] (Deputy General Counsel)
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	[REDACTED], Senior Corporate Counsel
	Telephone Number:	([REDACTED])
	Subject(s):	Relevant product markets at issue in the Complaint, including the instream online video advertising market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

61.	Name:	Employees of [REDACTED], including [REDACTED] (Local Media Director), [REDACTED] (VP & General Counsel)
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	[REDACTED], General Counsel
	Telephone Number	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad buying tools market and the instream online

		video advertising market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct
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62.	Name:	Employees of [REDACTED], <i>including</i> [REDACTED] (Senior Legal Director at [REDACTED] [REDACTED] (Vice President of Ad Exchanges), [REDACTED] (Assistant General Counsel), [REDACTED] (Associate General Counsel)
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	[REDACTED], Associate General Counsel
	Telephone Number	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad buying tools market, the ad exchange market, the ad network market, and the ad server market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

63.	Name:	Employees of [REDACTED], <i>including</i> [REDACTED] (Vice President of Strategy for [REDACTED] (Senior Director of Digital Marketing), and [REDACTED] (Vice President of Product Management)
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	[REDACTED], Vice President and Chief Counsel, Antitrust Legal Compliance
	Telephone Number	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad buying tools market and the instream online video advertising market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

64.	Name:	Employees of [REDACTED], <i>including</i> [REDACTED] (Vice President and Global Head of Search)
	Address:	[REDACTED] [REDACTED] [REDACTED]

	Counsel/Contact:	c/o [REDACTED]
	Telephone Number:	[REDACTED]

	Subject(s):	Relevant product markets at issue in the Complaint, including the ad buying tools market and the instream online video advertising market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct
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65.	Name:	Employees of [REDACTED], including [REDACTED] (Head of [REDACTED]) and [REDACTED] (Senior Vice President of Enterprise, Media and Channel Partnerships)
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	[REDACTED], Chief Privacy Officer
	Telephone Number:	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad buying tools market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

66.	Name:	[REDACTED], including [REDACTED] (Legal Director), [REDACTED] (Technologist), [REDACTED] (Attorney), and [REDACTED] (Technologist)
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	[REDACTED], Attorney
	Telephone Number:	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad server market and ad exchange market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

67.	Name:	[REDACTED]
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	[REDACTED]
	Telephone Number:	[REDACTED]

	Subject(s):	Relevant product markets at issue in the Complaint, including the ad server market and ad buying tools market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct
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68.	Name:	██████████
	Address:	
	Counsel/Contact:	
	Telephone Number:	██████████
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad buying tools market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

69.	Name:	██████████
	Address:	
	Counsel/Contact:	
	Telephone Number:	
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad server market, ad exchange market, and ad buying tools market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

70.	Name:	Employees of ██████████, including ██████████ (CEO of ██████████)
	Address:	██████████ ██████████ ████████████████████
	Counsel/Contact:	██████████ (Consule for ██████████)
	Telephone Number:	██████████
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad server market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

71.	Name:	Employees of [REDACTED], including [REDACTED] (Chief Policy & Industrial Relations Officer) and [REDACTED] (Founder & CEO)
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	
	Telephone Number:	
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad server market, ad exchange market, and browser market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

72.	Name:	Employees of [REDACTED] including [REDACTED] (Chief Corporate Strategy & Development Officer)
	Address:	[REDACTED] [REDACTED]
	Counsel/Contact:	
	Telephone Number:	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the search ad market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

73.	Name:	Employees of [REDACTED], including [REDACTED] (Co-CEO & President), and [REDACTED] (Sr. VP for Digital Media)
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	[REDACTED] (VP & Deputy General Counsel)
	Telephone Number:	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad server market, ad exchange market, ad buying tools market, and instream online video advertising market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

74.	Name:	Employees of [REDACTED] including [REDACTED] (CEO)
	Address:	[REDACTED] [REDACTED]
	Counsel/Contact:	[REDACTED] (General Counsel)
	Telephone Number:	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the search ad market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

75.	Name:	Employees of [REDACTED], including [REDACTED] (Chief Communications Officer), [REDACTED] (EVP), and [REDACTED] (President & Head of Products & Platforms)
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	
	Telephone Number:	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad server market, ad exchange market, and ad buying tools market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct

76.	Name:	Employees of [REDACTED], including [REDACTED] (Sr. VP of Digital Strategy, Corporate Development, and Operations)
	Address:	[REDACTED] [REDACTED] [REDACTED]
	Counsel/Contact:	
	Telephone Number:	[REDACTED]
	Subject(s):	Relevant product markets at issue in the Complaint, including the ad server market, ad exchange market, and ad buying tools market; competition and barriers to entry in the relevant markets; Google's exclusionary conduct; and the anticompetitive effects arising from that conduct